

**EXHIBIT B**

**Excerpt from July 12, 2022 Deposition of Toni  
Rose**

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1 A. I have no idea.

2 Q. In looking at those districts in E2106, do you  
3 have an opinion on whether any of those districts are  
4 African-American-opportunity districts?

5 A. I have no opinion. I did not deal with the  
6 State Board of Education.

7 Q. And looking at E2106, do you have any opinion  
8 on whether any of the districts, whether in any of the  
9 districts Anglos are able to vote cohesively to defeat a  
10 minority candidate of choice?

11 A. I have no opinion on that.

12 Q. All right. I'm going to hand you what will be  
13 marked as Exhibit 17, which is the Red-100T for  
14 PLANC2193, which is the final congressional map.

15 (Defendant's Exhibit No. 17 was marked  
16 for identification.)

17 Q. (BY MS. CORBELLO) Go ahead and take a second  
18 with it if you need to.

19 Do you know who drew C2193,  
20 Representative?

21 A. I do not.

22 Q. Were you in the room at any time when C2193  
23 was being drawn?

24 A. I was not in the room.

25 Q. Did you have any private conversations with

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1 anyone regarding why C2193 was drawn the way that it  
2 was?

3 A. No. I did not have any conversations.

4 Q. Being the final map, C2193 passed in the  
5 Senate, right?

6 A. Yes.

7 Q. Do you have any opinion on why any of your  
8 Senate colleagues voted yes or no on C2193?

9 A. I don't have an opinion.

10 Q. Is there anyone you can identify in the Senate  
11 who voted in favor of C2193 in order to intentionally  
12 discriminate against voters based on their race?

13 A. I cannot.

14 Q. C2193 passed in the House, right?

15 A. Yes.

16 Q. Do you have any opinion on whether any of your  
17 House colleagues voted in favor of C2193 in order to  
18 intentionally discriminate against voters based on their  
19 race?

20 A. I do not have an opinion.

21 Q. Are you personally aware of any evidence that  
22 exists as to the intent of the map drawers of C2193?

23 A. No. I do not have any evidence.

24 Q. Looking at the congressional districts as they  
25 were drawn in the final map, are there any districts you